

# HAMILTON COUNTY, INDIANA

## FY20 CONSOLIDATED ANNUAL PERFORMANCE REPORT

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## **CR-05 - Goals and Outcomes**

### **Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)**

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

The U.S. Department of Housing and Urban Development (HUD) awards Community Development Block Grant (CDBG) funds communities across the US. Hamilton County received an allocation of \$1,083,892 in CDBG funds for the 2020 program year (PY20). In order to receive CDBG funding, Hamilton County must prepare a five-year comprehensive plan and an annual action plan. The annual action plan describes how funding will be spent to meet the goals and strategies developed in the five-year comprehensive plan. To achieve these goals Hamilton County partners with a variety of organizations working towards specific goals. This year end report, or CAPER, will report the progress made during the second year of the 2019-2023 Consolidated Plan.

Additionally, in April of 2020 the County received a supplemental allocation of \$637,715, and a second allocation in June 2020 of \$1,055,950, totaling together \$1,693,665 in Community Development Block Grant Coronavirus (CDBG-CV) funds from the Coronavirus Aid, Relief, and Economic Security Act, also known as the CARES Act. The County allocated those funds towards public services to assist households impacted by the COVID-19 pandemic. These activities will be reported on in this report.

In fiscal year 2020, Hamilton County worked with Hamilton County Area Neighborhood Development, Inc. (HAND, Inc.) on a home repair program serving eligible homeowners in eligible areas of Hamilton County. The activity served three homeowners and expended \$91,169.41 during the program year. Activity 359 – Cherry Tree Road was put on hold when the local Habitat Chapter was folded into the Greater Indianapolis chapter. The property was transferred to Greater Indianapolis Habitat for Humanity when the two agencies merged. NHA is working with Greater Indianapolis Habitat for Humanity to either develop the Cherry Tree Road property or to develop another project in Hamilton County.

Hamilton County works with a variety of public service agencies. During PY2020 \$460,159.79 was expended on eligible public service activities serving 95,097 people with a variety of supportive services for eligible clients including medical services, emergency housing and services for victims of domestic violence, food transportation services, senior services, legal services and those households impacted by the COVID 19 pandemic.

Hamilton County typically spends a large percentage of its funding each year on infrastructure projects in four participating communities, Carmel, Fishers, Noblesville and Westfield, and in eligible unincorporated areas of Hamilton County. \$507,025.41 was expended during PY20 on eight infrastructure activities in Hamilton County. The City of Carmel is currently working on one infrastructure activity (365) using funding from PY15, PY16, PY17, PY18, PY19 and PY20. This activity will be fully reported in the PY21 CAPER. The City of Fishers completed two infrastructure activities during PY20 though one (358) was primarily completed in the previous year while the second (368) was completed in PY20. The City of Noblesville completed two infrastructure activities during PY20 though one (329) was primarily completed in the previous year while the second (367) was completed in PY20. The City of Westfield completed one infrastructure activity (338) during PY20 though most of the funding was expended in PY19. Hamilton County completed one infrastructure activity (337) in Clay Township during PY19 and was fully reported in the PY19 CAPER. The county currently is working on another activity (366) in Clay Township using funding from PY 17, PY18, PY19 and PY20. This activity will be fully reported in the PY21 CAPER.

CDBG-CV outcomes during the 2020 program year served almost 60,000 Hamilton County residents. The township trustees worked together (activities 339, 343, 344, 345, 346, 349 and 360} to expend \$232,262.20 to help prevent homelessness through rental and utility assistance to 450 households. Six not for profits serving Hamilton County expended \$141,717.31 to assist 58,589 eligible clients with a variety of services (activities 340, 341, 342, 347, 348 and 361) including assistance for seniors, food assistance to low-income youths, food banks as well as help with homeless prevention. All of those assisted had been impacted in some form by the COVID-19 pandemic. Any remaining CDBG-CV funding will continue to be used in Hamilton County to assist eligible residents impacted by the COVID-19 pandemic. These activities will be reported in future reports.

**Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)**

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee’s program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Administration and Planning	Administration and Planning	CDBG: \$	Other	Other	1	1	100.00%	1	1	100.00%

Affordable Housing	Affordable Housing	CDBG: \$	Homeowner Housing Added	Household Housing Unit	0	0		9	3	33.33%
Affordable Housing	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	16	8	50.00%			
Homeless Assistance	Homeless	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	137		675	137	20.30%
Homeless Assistance	Homeless	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	0	3		0	3	
Homeless Assistance	Homeless	CDBG: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0		0	0	
Homeless Assistance	Homeless	CDBG: \$	Homelessness Prevention	Persons Assisted	50	0	0.00%			
Public Infrastructure and Facility Improvements	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1010	31858	3,154.26%	1810	18911	1,044.81%
Public Infrastructure and Facility Improvements	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	20	0	0.00%			

Public Services	Non-Housing Community Development	CDBG: \$ / CDBG-CV: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0		0	0	
Public Services	Non-Housing Community Development	CDBG: \$ / CDBG-CV: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	10425	93698	898.78%	2675	76097	2,844.75%
Public Services	Non-Housing Community Development	CDBG: \$ / CDBG-CV: \$	Homelessness Prevention	Persons Assisted	0	1407		0	998	

**Table 1 - Accomplishments – Program Year & Strategic Plan to Date**

**Assess how the jurisdiction’s use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.**

All CDBG funds were used to support programs and activities that met national objectives. The County funds activities with CDBG that provides 100% cumulative benefit to low-income households. The greatest need and expenditure was for public infrastructure, consistent with the County’s highest priority for the use of funds, followed by public services, particularly with CDBG-CV funding.

All service providers applying for a source of federal funding and requiring a certification of consistency with the County’s Consolidated Plan, received the certifications in a timely manner. Hamilton County collaborates with a number of community based organizations to achieve its goals and objectives for community development.

Hamilton County CDBG program directed funding to programs and projects that meet the following criteria:

1. Expand the supply of safe, decent affordable housing.

2. Support programs that help the most vulnerable households achieve self-sufficiency.
3. Invest in public facility and public infrastructure needs of low-income neighborhoods.
4. Improve access to and availability of services for households experiencing homelessness including those who do not meet the formal HUD definition due to doubling up.

In addition, the following federal criteria apply to all activities:

- Meet a goal of the 2019 - 2023 Consolidated Plan: Demonstrate a significance of need
- Serve an eligible area within Hamilton County
- Project or program is eligible under HUD rules
- Create a visual impact in the neighborhood, particularly if an infrastructure project
- Benefits persons at-risk of homelessness or who are homeless
- Benefits a special needs population

As an urban county Hamilton County works with its incorporated communities to assist with eligible CDBG activities throughout the county. Though there are eight incorporated areas in Hamilton County, four (the Towns of Arcadia, Atlanta, Cicero and Sheridan) have opted out to pursue larger amounts of CDBG funding through the State of Indiana Small Cities Program. While these communities have been successful in applying for and receiving state funding for large infrastructure activities, by opting out, the county cannot expend CDBG funds in those communities for public services or housing activities such as home repair. These communities must depend upon not for profit agencies to provide these services as they can.

As a result of the limits HUD places on the funding amounts for public services (15%), most of the CDBG funding is used for major infrastructure activities in the participating communities of Carmel, Fishers, Noblesville, Westfield and eligible unincorporated areas. Funding is also used for housing activities as projects are developed. The county works with each of the participating communities to identify eligible activities and infrastructure needs. Each activity must take place in an eligible census tract or serve an eligible community and should also have a positive visual impact in the neighborhoods they serve. When the county received additional funding with the CDBG-CV award additional funding was made available for public services. As a result, many more households were able receive services. On April 9, 2020, HUD disseminated a memorandum titled: CARES Act Flexibilities for CDBG Funds Used to Support Coronavirus Response and plan amendment waiver. This memo

eliminated the 15% cap on Public Service funding thereby allowing grantees to provide additional public service funding to sub-recipients. This allowed Hamilton County to assist many more households with rent and utility assistance along with greater access to other public services.

## CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted).

91.520(a)

	<b>CDBG</b>
White	46,890
Black or African American	18,655
Asian	4,322
American Indian or American Native	121
Native Hawaiian or Other Pacific Islander	34
<b>Total</b>	<b>70,022</b>
Hispanic	29,492
Not Hispanic	47,592

**Table 2 – Table of assistance to racial and ethnic populations by source of funds**

### Narrative

A total of 77,084 persons were assisted with CDBG and CDBG-CV funds during program year 2020. Numbers that are not included in the above table include: Black/African American & White (4,015 persons); Other Multi-racial (3,040 persons); American Indian/Alaskan Native & White (10 persons); Asian & White (23 persons); and American Indian/Alaskan Native & Black/African American (4 persons).

## CR-15 - Resources and Investments 91.520(a)

### Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	1,083,892	1,240,683

Table 3 - Resources Made Available

### Narrative

Activities carried out to meet priorities from the Consolidated Plan and the PY2020 Action Plan were funded from CDBG and CDBG-CV funds. These funds were targeted to meet the greatest needs, and expenditures were directly related to programs that supported the County's Consolidated Plan.

At the end of PY2019, the County received an allocation of the CDBG-CV funds from the CARES Act. The County allocated those funds towards social services to assist low-mode income households impacted by the COVID 19 pandemic. Because of the timing of the CDBG-CV funds availability, associated programs were only starting to be implemented by the conclusion of PY2019. Accordingly, full reporting on the use of the CARES Act CDBG-CV funds is included in this CAPER.

Hamilton County received \$1,083,892 in fiscal year 2020 in addition to any funding remaining from previous funding years. During the PY19 fiscal year, Hamilton County expended \$1,240,683.34. All recipients of CDBG funding have requirements dictating the rate at which the funds should be spent. The requirement states each recipient shall have no more than 1.5 times its annual allocation 60 days prior to the close of the fiscal year. Due to the COVID-19 pandemic and associated delays with many activities the county struggled to meet the expenditure requirements. The county will continue to encourage and prioritize projects with achievable outcomes that can be completed in a timely manner.

### Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
City of Carmel	9	5	Auman Newark storm sewer improvements
City of Fishers	12	27	ADA sidewalk improvements
City of Noblesville	8	7	Sidewalk improvements
City of Westfield	5	0	
County wide	66	61	Public service activities including CDBG-CV activities
Eligible Township Census Tracts			

Table 4 – Identify the geographic distribution and location of investments

## **Narrative**

Hamilton County does not have a specific target area; funds were used county-wide. The County provided programs and services identified in its Consolidated Plan and other local plans to households with the greatest need. Therefore, most activities served eligible low-income households on a countywide basis and these applicants applied for assistance on a program-by-program basis. Physical activities, including housing and neighborhood improvements, are generally provided within Census Block Group Areas that have the greatest concentrations of low-income households.

## Leveraging

**Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.**

Hamilton County encourages efforts by Carmel, Fishers, Noblesville and Westfield to leverage federal investments as part of public infrastructure projects in their communities. During the 2020 fiscal year no additional funding was identified. The Hamilton County CDBG program did not utilize any public owned land or property to address a need identified in the Consolidated Plan.

## CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	459	504
Number of Special-Needs households to be provided affordable housing units	0	0
<b>Total</b>	<b>459</b>	<b>504</b>

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	450	504
Number of households supported through The Production of New Units	9	3
Number of households supported through Rehab of Existing Units	0	0
Number of households supported through Acquisition of Existing Units	0	0
<b>Total</b>	<b>459</b>	<b>507</b>

Table 6 – Number of Households Supported

**Discuss the difference between goals and outcomes and problems encountered in meeting these goals.**

The NHA utilizes CDBG dollars primarily to preserve affordable housing through the rehabilitation of existing units and to create new affordable housing, particularly for senior citizens. Specific projects are determined on an as-needed basis and as such are difficult to quantify. Originally, the Home Repair Partnership was estimated to repair between 12 and 20 homes in PY20. However, the COVID-19 Pandemic necessitated refocusing on the public services components to the Consolidated

Plan. Three eligible homeowners received housing repairs during PY2020. Through the use of CDBG-CV funding \$164,637.34 was expended to assist 504 families with rent, utilities, and burial assistance.

**Discuss how these outcomes will impact future annual action plans.**

The uncertain timing and duration of the COVID-19 pandemic creates difficulties in making firm projections on future years’ activities. At this time, however, the County’s PY2021 Action Plan combined with CV-3 funding intends to resume the achievement of the goals and objectives outlined in the five-year (2019-2023) Strategic Plan. The County has allocated CDBG funding as well as CDBG-CV funding to create new affordable housing in Hamilton County.

**Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.**

<b>Number of Households Served</b>	<b>CDBG Actual</b>	<b>HOME Actual</b>
Extremely Low-income	357	0
Low-income	82	0
Moderate-income	62	0
<b>Total</b>	<b>501</b>	<b>0</b>

**Table 7 – Number of Households Served**

**Narrative Information**

During the PY2019, Hamilton County allocated \$400,000 of its CDBG-CV funding towards rent, utility and burial assistance through the Hamilton County Township Trustees. Of that allocation, \$110,222.39 was spent prior to September 30, 2021. A total of 450 individuals received assistance in PY2020 from these programs in addition to the households that received this funding during the 2019 program year.

**CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)**  
**Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:**

**Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

Hamilton County funded Family Promise in PY2020, an organization that serves homeless individuals. The Hamilton County affiliate of Family Promise is a new organization, having opened in May 2019. Family Promise is a nationwide network of affiliates that offer prevention services, crisis housing and sheltered, case management and housing stabilization programs to families who are experiencing homelessness and at risk of homelessness. In PY2020, Family Promise used CDBG funding (activity 325) to sign a long-term lease for space in Noblesville to use a day center for the assistance of homeless children and their families. These activities (335 and 347) served 133 individuals/families who were either experiencing homelessness or at-risk of homelessness.

Additionally, CDBG-CV funds were used to assist near homeless or homeless families in Hamilton County. The township trustees received CDBG-CV funds (activities 339, 343, 344, 345, 346, 349 and 360) and were able to assist 450 households using \$110,222.34 in CDBG-CV funding.

Homeless individuals can also be served by other local services funded with CDBG funds, such as the Trinity Free Clinic (activities 320, 334 and 364), Prevail (activity 323, 332 and 355) and the Good Samaritan Network (activities 324, 330 356). These providers can serve as the first line of services for homeless individuals reaching out in Hamilton County for help. However, the reports provided to the Noblesville Housing Authority, the CDBG administrator, do not include homelessness status. 2,831 people were served by these activities in PY2020.

**Addressing the emergency shelter and transitional housing needs of homeless persons**

Alternatives of Madison County (activity 354) shelters victims of domestic violence from Hamilton County, offering a temporary and safe place to live. Beyond the shelter, Alternatives of Madison County has a transitional housing program, assisting individuals and families as they move from the shelter to permanent housing. This supportive housing program can last up to two years as the families establish lives outside of domestic violence. The program is located in Anderson, Indiana, Northeast of Hamilton County, and offers a variety of services for domestic violence victims. Services include 24-hour crisis center and response team, emergency transportation, case management, support and advocacy and children's services. Additional resources for hotel/motel stays were provided to another local agency to house families facing homelessness during the pandemic. As a result, services at the Alternatives, Inc. shelter were not needed. That is why only three persons were helped in PY2020.

Prevail, Inc. (activity 355) serves the Hamilton County community as an advocate for victims of crime

and abuse. Case managers, or advocates, help victims develop a safety plan, empower victims and work with the entire family to begin a new start to life after trauma. In PY2020, Prevail assisted 379 individual victims of violence with supports and services.

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs**

In PY 2019 (awarded in PY20), Hamilton County awarded \$154,415 of CDBG and CDBG-CV to the Good Samaritan Network and \$10,000 of CDBG-CV to Family Promise of Hamilton County to help with homelessness prevention was completed during PY2020. The Good Samaritan Network offers rent and utility assistance for households at risk of losing their housing either through eviction or foreclosure. The program coordinates with township trustees to find families and households needing this service. For many families, this program is the last opportunity to avoid homelessness. In fiscal year 2020 they assisted 5,119 households.

Family Promise of Hamilton County works with homeless families to assist with housing needs as well as helping the family develop the tools and skills needed to avoid a homeless situation in the future. During PY2020 Family Promise provided services to 54 individuals.

Additionally, the township trustees used \$110,222.34 of CDBG-CV funding to help 450 households avoid homelessness during PY2020.

**Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again**

Hamilton County is part of Region 8 in the State of Indiana Continuum of Care, made up of four counties. Region 8 is advocating for more affordable housing development in Hamilton County. Many stakeholders continue to state the greatest need of low income individuals is the development of more affordable housing for extremely low income households.

Family Promise of Hamilton County provides assistance to homeless or near homeless families through the provision of financial assistance, counseling and training to help homeless children and their families regain their housing and independence.

## **CR-30 - Public Housing 91.220(h); 91.320(j)**

### **Actions taken to address the needs of public housing**

The Noblesville Housing Authority (NHA) is the public housing agency serving Hamilton County by means of a cooperative agreement with Indiana Housing & Community Development Authority (IHCDA). NHA does not own or manage any public housing units. NHA only offers the Housing Choice Voucher (HCV) program a/k/a Section 8 vouchers to the low-income households. The Section 8 voucher program offers subsidy to a household to allow them to rent any residential unit in the local housing authorities' jurisdiction. The household will pay approximately 30 percent of their monthly adjusted income towards monthly housing costs and the Housing Choice Voucher covers the remaining cost.

IHCDA also has a voucher program serving Hamilton County with a total of 106 households receiving assistance. Households receiving assistance from the IHCDA program do not need to transfer into the NHA program in order to receive assistance in the Hamilton County jurisdiction. The cooperative agreement between the NHA and IHCDA has enabled more households to benefit from the services and amenities in Hamilton County and has enabled greater choice for voucher recipients without the additional paperwork that is associated with HCV portability.

The most immediate need for NHA is finding additional funding and Housing Choice Vouchers to provide voucher assistance to Hamilton County residents in need. NHA has an Annual Contribution Contract (ACC) with HUD for 192 Housing Choice Vouchers (HCV) monthly. Turnover of vouchers is slow as most households do not "graduate" from needing a subsidy. The majority of voucher holders are elderly and disabled, returning their voucher when they cannot live independently or pass away. Demand for accessible one-bedroom housing units is the greatest need in the community.

Demand for new vouchers has increased with the cost burden of housing in Hamilton County increasing for many families, including the elderly. The waiting list last opened from December 2, 2020 to December 11, 2020. During the open waiting list 866 households signed up for housing assistance, and 200 households were selected based upon local preference and lottery. There are currently 150 households on NHA's waiting list.

### **Actions taken to encourage public housing residents to become more involved in management and participate in homeownership**

The Noblesville Housing Authority does not own or manage housing units and only administers a voucher program. The voucher program is a basic rental assistance program. Section 8 vouchers, from the U.S. Department of Housing and Urban Development (HUD) allow households to access housing that would not be affordable to them. The household pays approximately 30 percent of their adjusted monthly income and the voucher pays the remainder of the rent owed to the landlord.

NHA does not currently offer homeownership with its program to voucher holders; however, the agency would consider this approach.

### **Actions taken to provide assistance to troubled PHAs**

The Noblesville Housing Authority does not have a troubled status. Since the Section 8 Management Assessment Program (SEMAP) began in 1998, Noblesville Housing Authority has consistently been rated a High performing housing authority.

## **CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)**

**Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)**

While barriers to affordable housing can come from anywhere, the U.S. Department of Housing and Urban Development (HUD) recognizes a few universal barriers. Local and state regulations on zoning and building are the most recognized barriers to affordable housing. With increased regulation comes an increased cost to build housing that meets all regulations. Hamilton County created a new Analysis of Impediments to Fair Housing in Fiscal Year 2018. The document found the following impediments:

- Lack of affordable housing affects housing choice and may adversely affect the protected classes.
- Knowledge of fair housing laws and where to report vary in the community.
- Institutional and regional coordination of enforcement and advocacy needs to improve.

Additionally, the AI discussed other barriers that prevent, or increase the challenge of affordable housing development. The barriers include:

- High costs of property acquisition near amenities in the more developed communities of Hamilton County, such as Carmel, Fishers, Noblesville and Westfield
- Overcoming challenges developing affordable housing, subsidizing projects large enough to serve the largest populations with cost burden, households earning 0-30 percent of the area median income
- The marketability of affordable housing and increasing support from local civic leaders and the community for this type of development
- The lack of transportation where creation of affordable housing development is less of a financial challenge

Large apartment complexes with corporate ownership represent nearly all rental housing stock, requiring corporate approval of rental applications will often over-ride local management's ability to accept low-income renters with challenges such as short employment history and credit history.

## **Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)**

Hamilton County has set goals to develop rental housing for underserved needs households in the community, including extremely low-income households, senior households, or recently homeless households. In 2019 HAND completed construction of a 10-unit rental project that serves low-income seniors. HAND received CDBG funds from Hamilton County and HOME funds from Indiana Housing and Community Development Authority to construct 11 affordable rental units in Fishers, and construction is

expected to start early next year. In October 2021, RealAmerica Services completed an affordable property in Fishers known as SouthPointe Village. The development was funded in part with Low Income Housing Tax Credits through IHCD, and includes 62 1- and 2-bedroom units. In September 2020, Priority Life Care completed an affordable assisted living development known as Lake Meadows Senior Assisted Living in Fishers. The development also was funded in part with Low Income Housing Tax Credits through IHCD, and includes 60 one-bedroom and studio units. Hamilton County has set aside CDBG and CDBG-CV Funding for several affordable housing projects currently in the planning stages.

### **Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)**

The Hamilton County Health Department recommends that children six (6) years old and under be screened for lead, particularly those children living in, regularly visiting or attending a child care facility built before 1978 should be tested. The local health department also provides guidance to address any concerns parents or guardians might have as well as guidance for renovating and clean up lead based paint hazards.

Any households with children who test high for lead paint blood levels may be referred to the Noblesville Housing Authority or HAND. Funding from the owner occupied assistance program may resolve lead based paint hazards found in the home. Any work completed was in compliance with the Environmental Protection Agency's lead based paint rules and regulations.

### **Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)**

In 2014, Hamilton County adopted a new anti-poverty policy. This strategy is crucial for demonstrating the Noblesville Housing Authority's commitment to tackling poverty. The Noblesville Housing Authority, in partnership with the social service and housing providers in the community, will strive for the goals and strategies below to help households stay out of poverty or become self-sufficient and elevate themselves from living in poverty:

- Promote economic empowerment by supporting facilities, services and activities aimed at developing the self-sufficiency for all low to moderate-income residents. Programs and activities to be supported over the next year include case management services, health services, food pantries, child care and transportation.
- Provide economic development opportunities to low to moderate-income families. Programs and activities to be funded over the next year include job training and placement and promotion of Section 3 opportunities.
- Provide affordable housing opportunities to low and moderate-income households – specifically identifying rental housing projects that are affordable to households earning incomes below 30 percent of the area median income.
- Continue to work with local agencies to identify barriers and issues related to poverty and support programs that will help low to moderate-income households overcome those barriers.

In 2020 Hamilton County funded a variety of social service projects to assist low-income families and individuals, many who live below the poverty line. Hamilton County funded programs such as the Trinity Free Clinic, Shepherd Center, HOPE Clinic, Meals on Wheels and Prevail. Of those served by these agencies, most of the individuals earned income less than 30 percent of the median income. Additionally, CDBG-CV funding assisted many Hamilton County residents avoid homelessness via utility and rental assistance.

### **Actions taken to develop institutional structure. 91.220(k); 91.320(j)**

The 2019-2023 Action Plan stated that the institutional structure currently used to develop affordable housing may face organizational and other non-regulatory barriers to affordable housing development. Consultations with community leaders and stakeholders suggested there are barriers that the hard data may not provide. These include barriers that prevent, or increase the challenge of affordable housing development. The barriers shared by those leaders and stakeholders include:

- High costs of property acquisition near amenities in the more developed communities of Hamilton County, such as Carmel, Fishers, Noblesville and Westfield.
- Overcoming challenges developing affordable housing, subsidizing projects large enough to serve the largest populations with cost burden, households earning 0-30 percent of the area median income.
- The marketability of affordable housing and increasing support from local civic leaders and the community for this type of development.
- The lack of transportation where creation of affordable housing development is less of a financial challenge.

Large apartment complexes with corporate ownership represent nearly all rental housing stock, requiring corporate approval of rental applications will often over-ride local management's ability to accept low income renters with challenges such as short employment history and credit history.

### **Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)**

The Good Samaritan Network (GSN) is the primary way to connect all service providers throughout Hamilton County. The network includes a variety of providers, from large/corporate health providers to smaller, faith based food pantries. The Network will continue its efforts to build capacity and coordinate service provisions across the county in the coming year. This relationship has proven especially important as the county has been dealing with the COVID 19 crisis as the GSN has helped facilitate communication and coordination of various CDBG-CV activities.

Hamilton County and the Noblesville Housing Authority want to support and expand the efforts of this organization to not only build up the capacity of its members, but to also connect the members to local housing providers and the Region 8 Planning Council for the Indiana Continuum of Care. By connecting

the three different organizations, planning efforts will be more streamlined and projects developed from those efforts will go more to address the households and individuals with the most need.

Using both CDBG and CDBG-CV, the county is working with both not-for-profit and for-profit developers to develop new affordable housing in Hamilton County.

**Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)**

Hamilton County created a new Analysis of Impediments to Fair Housing in 2019. The new analysis confirmed the greatest impediment to fair housing is the lack of affordable housing in Hamilton County. The document found the following impediments:

- Lack of affordable housing affects housing choice and may adversely affect the protected classes.
- Knowledge of fair housing laws and where to report vary in the community.
- Institutional and regional coordination of enforcement and advocacy needs to improve.

Hamilton County will use partnerships with State Government, local non-profit housing providers, local public service providers or community development advocacy groups to go beyond the steps listed in this plan to promote fair housing. Hamilton County will support other initiatives by the State of Indiana, the City of Anderson and the City of Indianapolis, all neighboring jurisdictions with their own Analysis of Impediments to Fair Housing, to promote fair housing. Such initiatives may include education programs related to fair housing, homeownership training or landlord/tenant legal services.

Following the execution of the Voluntary Compliance Agreement the Noblesville Housing Authority began reaching out to elected officials, community stakeholders, and area non-profits with a vested interest in affordable housing and fair housing in Hamilton County.

As discussed previously, on January 8, 2019 the initial meeting of the Hamilton County- City of Noblesville Affordable Housing Working Group met at the Noblesville City Hall. Since this first meeting several additional groups have been formed to address issues and develop solutions to for the affordable housing crisis in Hamilton County. As a result, the city of Noblesville has significantly strengthened its oversight and review of ordinances and projects to ensure that all ordinances and housing projects brought to the city are reviewed for and examined for barriers or impediments to the development and preservation of affordable housing. NHA continues to work with the Noblesville Diversity Coalition to develop an affordable housing outreach and education plan for Noblesville.

The City of Noblesville is currently completing a housing analysis that updates the study completed in 2016. They are also working with a variety of not for profit and for-profit developers to develop over 100 units of affordable housing.

## **CR-40 - Monitoring 91.220 and 91.230**

**Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements**

Monitoring assures that recipients of federal funds are in compliance with local objectives and federal program requirements. The intent of the Noblesville Housing Authority is to work cooperatively with contractors, grantees and sub-recipients in the use of federal funds as best as possible and within reasonable time constraints.

### Initial Review of Project Eligibility

1. Requests for funding must be supported with an application to be reviewed for allocation recommendation. Applications include specific information regarding design of project, cost of project and beneficiaries.
2. Each activity must be eligible under related program rules and must meet one of the three national objectives.
3. An activity must be consistent with local goals and objectives as expressed in adopted policies and/or established plans and must comply with related program regulations.
4. Successfully funded applicants are required to sign a funding agreement outlining all of the requirements, regulations and standards.

### Ongoing Review of Project Compliance

1. On-site monitoring will be conducted as may be deemed necessary and reasonable by the Noblesville Housing Authority. Desk reviews and off-site monitoring will be an ongoing activity.
2. Claims for payment are filed, with appropriate documentation, with the program manager. The program manager reviews the claim and approves it for payment.
3. Quarterly, monthly, and/or annual reports on project and activity status is required of all sub-recipients.
4. The program manager will also monitor for beneficiary compliance.
5. The Noblesville Housing Authority (NHA) programs generally do not include program income to the sub-recipient/contractor.

### Follow-up and Enforcement

1. Compliance concerns are addressed at all phases of an activity, as soon as the project manager is aware of the issue. Technical assistance is provided as necessary to maintain compliance.
2. Annual reviews of sub-recipient activities are conducted by the project manager, using a checklist of areas to be reviewed.

3. Subrecipients may be required to file a Certified Public Accountant (CPA) annual report of subrecipient's financial stability and federally funded project expenditures. Records shall be maintained for five years after project closeout.
4. Enforcement of activities not in compliance shall follow Part 85.43 with the right of appeal, as well as termination of a contract/agreement..

Hamilton County encourages the use of minority (MBE), women (WBE) and veteran (VBE) owned businesses for each of its programs.

### **Citizen Participation Plan 91.105(d); 91.115(d)**

#### **Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.**

The County implemented its Citizen Participation Plan in efforts to provide the community with reasonable notice and opportunity to comment on performance reports. Due to the COVID-19 pandemic, the County had to conduct its public input process in a virtual format, with Zoom meetings and accepting comments through an email. These meetings were carried out in accordance with an Amended Citizen Participation Plan.

This document, the PY2020 Consolidated Annual Performance and Evaluation Report, will be available for a fifteen-day comment period, December 8, 2021 until December 23, 2021. Hamilton County ... receive any comments during the fifteen day comment period.

### **CR-45 - CDBG 91.520(c)**

#### **Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.**

The goal of reaching the most vulnerable in the community and across Hamilton County is still a priority of the Hamilton County Commissioners. Additionally, as a result of timeliness issues, NHA is working closely with local officials as well as their housing and social service partners to ensure that activities are completed in an efficient and timely manner. While the county continues to serve the most vulnerable residents of Hamilton County, the COVID-19 pandemic has exposed a large cross section of the population this is just a missed paycheck or health crisis away from homelessness. Thousands were served in PY2020 who needed rent, utility, and food assistance.

#### **Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?**

No

**[BEDI grantees] Describe accomplishments and program outcomes during the last year.**

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